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Attorneys for Defendants

Ciba Specialty Chemicals Corporation,

Novartis Corporation and CIBA-GEIGY Corporation

**FILED**

JAN 29 2002

**JUDGE MARINA CORODEMUS**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MIDDLESEX COUNTY

Docket No. L-2093-01

Docket No. L-2521-01

Docket No. L-1669-01

Mass Tort Code 248

SUSANA ARENT, et al.,

Plaintiffs,

-vs-

CIBA-GEIGY CORPORATION, et al.,

Defendants.

MARGO KRAMER, et al.,

Plaintiffs,

-vs-

CIBA-GEIGY CORPORATION, et al.,

Defendants.

KATHLEEN JANES, et al.,

Plaintiffs,

-vs-

CIBA-GEIGY CORPORATION, et al.,

Defendants.

Civil Actions

**CASE MANAGEMENT ORDER VIII**

The above matter having come before the Court on January 15, 2002 for a case management conference, and for good cause and the reasons stated on the record,

It is on this the <sup>41</sup>29<sup>th</sup> day of January, 2002, ORDERED as follows:

1. plaintiffs' motion regarding the method of the Ciba defendants' document production and the Water Company's motion to compel more specific liability interrogatory answers from plaintiffs shall be submitted to Judge Gruccio for a Recommendation;
2. plaintiffs' motion to quash a subpoena issued by the Ciba defendants for certain medical records will be heard on the papers and returnable before the Court on January 25, 2002;
3. the Janes plaintiffs' motion to remove certain plaintiffs' as class representatives and the Ciba defendants' cross-motion for summary judgment shall be returnable before the Court on January 25, 2002;
4. plaintiffs' motion to amend any of the Complaints shall be returnable before the Court on February 8, 2002;
5. the Ciba defendants will contact Jorge Winkler and promptly advise all counsel of his availability for a deposition and the location of that deposition. In the event that Mr. Winkler will not voluntarily appear for his deposition, plaintiffs may apply under the Five Day Rule for issuance of a Commission to subpoena his attendance;
6. the Ciba defendants will provide by January 25, 2002 the Privilege Log for the Brown & Caldwell (Nashville) documents;
7. the Ciba defendants will provide by January 25, 2002 the Supplemental Privilege Log for the Brown & Caldwell (Mahwah) documents;
8. the Water Company will provide to the Kramer plaintiffs by January 25, 2002 a list of incorrect/incomplete addresses for plaintiffs who will revise that list, to the extent possible, within 30 days of receipt;

9. any party who wishes to take a video deposition must provide notice pursuant to R. 4:14-9;

10. Judge Gruccio will undertake an in camera review of the Grand Jury transcripts and provide the Court with a Confidential Recommendation on plaintiffs' motion to compel the production of those transcripts. (The parties are not to follow the procedure set forth in CMO I regarding any appeal from that Recommendation);

11. the Ciba defendants will provide all counsel by January 25, 2002 with a written basis for the privilege claimed for the documents in Boxes 870-09 and 870-13;

12. the cases are consolidated and the manner of trial, i.e. number of bellwether plaintiffs to be tried together will be determined in the future;

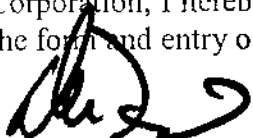
13. the next case management conference shall be on March 14, 2002 at 10:00 a.m.;

14. a copy of this Order be served by liaison counsel for the Ciba defendants on all counsel of record within 7 days hereof.

*Marina Corodemus*

Hon. Marina Corodemus, J.S.C.

On behalf of defendants CIBA-GEIGY, Novartis Corporation and Ciba Specialty Chemicals Corporation, I hereby consent to the form and entry of this Order.



David W. Field

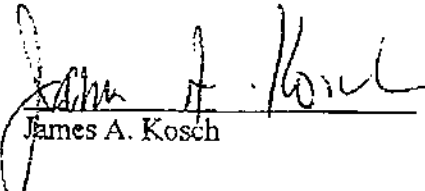
Dated: January 24, 2002

On behalf of the Kramer and Arent plaintiffs, I hereby consent to the form and entry of this Order.

\_\_\_\_\_  
Angelo J. Cifaldi

Dated: January , 2002

On behalf of defendants United Water Company, I hereby consent to the form and entry of this Order.

  
James A. Kosch

Dated: January 24, 2002

On behalf of the Janes plaintiffs, I hereby consent to the form and entry of this Order.

\_\_\_\_\_  
John E. Keefe, Jr.

Dated: January , 2002

On behalf of the Kramer and  
Arent plaintiffs, I hereby  
consent to the form and entry of  
this Order.

  
\_\_\_\_\_  
Angelo J. Chiodi

Dated: January **23**, 2002

On behalf of defendants United  
Water Company, I hereby  
consent to the form and entry of  
this Order.

\_\_\_\_\_  
James A. Kosch

Dated: January , 2002

On behalf of the Janes plaintiffs,  
I hereby consent to the form and  
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John E. Keefe, Jr.

Dated: January , 2002

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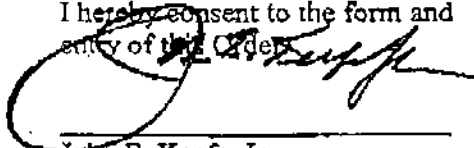
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John E. Keefe, Jr.

Dated: January 23, 2002